

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DIANE PLASSCHAERT,

Plaintiff,

v.

MERCK & CO., INC. and NOVARTIS  
PHARMACEUTICALS CORPORATION,

Defendants.

Civil Action No.: 1:08-cv-04097

**DEFENDANT'S DISCLOSURE  
STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, counsel for Defendant, Novartis Pharmaceuticals Corporation ("NPC"), hereby discloses and certifies that, to the best of my knowledge and belief, the following is a complete list of NPC's parent corporations and publicly held companies that own 10% or more of NPC's stock:

1. Parent Companies:
  - (a) Novartis Finance Corporation, a New York corporation;
  - (b) Novartis Corporation, a New York corporation;
  - (c) Novartis Holding, AG, a Swiss company; and
  - (d) Novartis AG, a Swiss company, whose American Depositary Shares are publicly traded on the New York Stock Exchange.
2. Publicly held companies owning more than 10% of NPC stock:
  - (a) Novartis AG indirectly owns a 100% interest in NPC.

Dated: May 27, 2008

Respectfully submitted,

s/ Diane E. Lifton

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 27, 2008, the Defendant's Disclosure Statement was filed with the Clerk of the Court and served in accordance with the Southern District's Rules on Electronic Service upon the following parties and participants:

Daniel A. Osborn, Esq.  
Russel H. Beatie, Esq.  
Philip J. Miller, Esq.  
Beatie and Osborn LLP  
521 Fifth Avenue, 34<sup>th</sup> Floor  
New York, NY 10175

I further certify that on May 27, 2008, I served a true and correct copy of the foregoing Defendant's Disclosure Statement by United States Mail, postage prepaid, on:

The Powell Law Firm, L.C.  
269 South Beverly Drive  
Suite 1156  
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The Offices of Jeffrey C. Bogert  
501 Colorado Boulevard  
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s/ Diane E. Lifton  
Diane E. Lifton